

REMARKS

Claims 1-42 are pending in the present application. The Examiner rejected claims 4-5, 11-12, and 35 under 35 U.S.C. §112, second paragraph, claims 1-9, 11, 13-20, 22-35, 37, and 39-41 under 35 U.S.C. §102, and claims 10, 12, 21, 36, 38, and 42 under 35 U.S.C. §103. Applicant has amended . No new matter has been introduced.

Section 112 Rejections

Claims 4-5, 11-12, and 35 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. The Examiner objected to the terms “relevant” and “non-relevant” as being relative terms not defined by the claim or the specification.

Applicant respectfully disagrees.

Applicant draws the Examiner’s attention to pages 11-12 of the specification, in which is provided an explanation of the terms “relevant” and “non-relevant”. As explained therein, “relevant” content in a document is content that is relevant for a particular type of device or display. Information that cannot be displayed on a given device, due to limitations of the device, inherent or otherwise, presentational information or previously displayed information, is “non-relevant” information that need not be delivered to the client for display.

Relevant content, on the other hand, is content that has not already been delivered or that can be displayed on the device. Applicant urges therefore that the specification provides a standard for determining the meaning of “relevant” vs. “non-relevant” content, and that claims 4-5, 11-12, and 35 are not indefinite. Reconsideration and withdrawal of these rejections are respectfully requested.

Section 102 Rejections

Claims 1-9, 11, 13-20, 22-35, 37, and 39-41 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,185,625 (Tso, *et al.*).

Applicant urges that independent claims 1, 28 and 29 are not anticipated by Tso for at least the reasons presented below.

At the very least, Tso does not disclose or suggest a system and method for filtering markup language documents that includes *constructing an input Document Object Model (DOM) based on a document corresponding to the request; . . . and filtering the input DOM to obtain a filtered DOM, based on at least one pre-specified rule being applied to the input DOM*, as essentially recited in claim 1. Furthermore, at the very least, Tso does not disclose or suggest a system and method for filtering markup language documents that includes *a filter operatively coupled to said intermediary, adapted to build an input document object model (DOM) based on the document, and filter the input DOM to output a filtered DOM based on at least one pre-specified rule being applied to the input DOM; and a differential DOM coder operatively coupled to at least one of the at least one client device and the intermediary, adapted to receive the filtered DOM and to identify and output at least changed data with respect to the input DOM and the filtered DOM*, as essentially recited in claims 28 and 29.

Tso is directed to a system for retrieving an object from a computer network that includes a remote scaling server coupled between the network client and the computer network that can encode the object and transmit the encoded object to the network client using a proxy. The scaling disclosed in Tso includes reduction of content dimension, reduction of content quality through compression, and translation of content to a more efficient representation format, and combinations thereof. (Tso, col. 2, lines 49-59, col. 3, line 61 to col. 4, line 7.)

The Examiner cites Tso as disclosing constructing a DOM at col. 6, lines 22-45, col. 8, lines 56-67, col. 11, lines 6-16, and col. 12, lines 20-45. Applicant urges that none of these sections of Tso disclose or suggest constructing a DOM. The cited sections of Tso disclose compressing or scaling a document, requesting an object from a cache, and a pop-up window enabling a user to indicate whether scaled or original content is desired. However, none of these sections disclose or suggest *constructing an input Document Object Model (DOM) based on a document, or build an input document object model (DOM) based on the document*:

Applicant notes that the document object model (DOM) is a programming interface for documents formulated by the World Wide Web Consortium. It specifies a tree-like logical structure for documents and identifies the interfaces and objects used to represent and manipulate a document, the semantics of these interfaces and objects, including both behavior and attributes, and the relationships and collaborations among these interfaces and objects. Tso nowhere discloses or suggests forming a tree-like logical structure for a document.

The Examiner cites Tso as disclosing filtering the input DOM based on at least one pre-specified rule at col. 6, lines 23-53, col. 19, lines 44-59, and col. 4, lines 17-50. The section cited by the Examiner disclose changing content by compression and/or scaling, however, there is no disclosure of *filtering an input DOM to obtained a filtered DOM*, or of a *pre-specified rule being applied to the input DOM*, as essentially recited in claim 1.

The Examiner cites Tso, col. 13, line 50 to col. 14, line 15 as disclosing a differential DOM decoder that can received the filtered DOM and identify and output changed data with respect to the inputs DOM. However, this section discloses a network client enabled to control service provider for decompressing and/or translating different types of data content. There is no disclosure that this data content is a *filtered DOM*, nor is there any disclosure in Tso of *a differential DOM coder . . . adapted to receive the filtered DOM and to identify and output at least changed data with respect to the input DOM and the filtered DOM*, as essentially claimed in claims 28 and 29.

Thus, for the reasons presented above, Applicant urges that Tso does not anticipate claims 1, 28 or 29. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 2-9, 11, 13-20, 22-35, 37 and 39-41 all depend from claims 1 or 29, and are thus patentable for at least the same reasons as claims 1 and 29. Reconsideration and withdrawal of these rejections are respectfully requested.

Section 103 Rejections

Claims 10 and 12 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of published Paciello, "Access to Electronic Information by People with Disabilities", IEEE, pg. 235-239, 1997. Claims 10 and 12 depend from claim 1. Paciello was cited for disclosing a system that teaches the production of electronic documents for people with disabilities, such as those who are hearing impaired or blind. However, as stated above, Tso does not disclose "", as claimed in claim 1, and Paciello does not remedy these defects in Tso. Thus, Applicant urges that a *prima facie* case of obviousness of claims 10 and 12 over Tso and Paciello cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

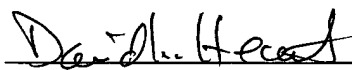
Claims 21 and 38 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of U.S. Patent No. 6,768,999 (Prager, *et al.*). Claim 21 depends from claim 1, and claim 38 depends from claim 29. Prager was cited for that a DOM is created automatically from documents, which can be in XML. However, as stated above, Tso alone does not disclose the limitations of either claim 1 or claim 29, and Prager does not rectify this defect. Thus, Applicant urges that a *prima facie* case of obviousness of claims 21 and 38 over Tso and Prager cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 36 and 42 were rejected under 35 U.S.C. §103 as being obvious over Tso in view of U.S. Patent No. 6,424,945 (Sorsa). Claims 36 and 42 both depend from claim 29. Sorsa was cited for teaching the use of speech synthesis to allow people to use a voice browser to browse the Internet. However, as stated above, Tso alone does not disclose the limitations of claim 29, and Sorsa does not rectify this defect. Thus, Applicant urges that a *prima facie* case of obviousness of claims 36 and 42 over Tso and Sorsa cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

CONCLUSION

Applicant urges that claims 1-42 are in condition for allowance for at least the reasons stated. Early and favorable action on this case is respectfully requested.

Respectfully submitted,

By: 
David L. Heath
Reg. No. 46,763
Attorney for Applicant

Mailing Address:

**F. Chau & Associates, LLC
130 Woodbury Road
Woodbury NY 11797
(516) 692-8888
(516) 692-8889 (FAX)**